<div align="center">**REMARKS**</div>

Claims 1-27 are now pending in the application. The Examiner is respectfully requested to reconsider and withdraw the rejections in view of the amendments and remarks contained herein.

REJECTION UNDER 35 U.S.C. § 103

Claims 1 and 21-23 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Van Thong (U.S. Pat. No. 6,490,553) in view of Bloom et al. (U.S. Pub. No. 2005/0042591).

Claims 2, 3, 9, 10, 17 and 20 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Van Thong (U.S. Pat. No. 6,490,553) in view of Bloom et al. (U.S. Pub. No. 2005/0042591) and further in view of Perez-Mendez et al. (U.S. Pat. No. 5,754,978).

Claims 4-8, 11-16 and 18 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Van Thong (U.S. Pat. No. 6,490,553) in view of Bloom et al. (U.S. Pub. No. 2005/0042591) and Perez-Mendez et al. (U.S. Pat. No. 5,754,978) and further in view of Bakis (U.S. Pat. No. 6,556,972).

Claim 19 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Van Thong (U.S. Pat. No. 6,490,553) in view of Bloom et al. (U.S. Pub. No. 2005/0042591) and Perez-Mendez et al. (U.S. Pat. No. 5,754,978) and further in view of Goldberg (U.S. Pat. No. 6,223,158).

Claim 24 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Van Thong (U.S. Pat. No. 6,490,553) in view of Bloom et al. (U.S. Pub. No. 2005/0042591) and further in view of Mercs et al. (U.S. Pat. No. 5,999,906).

Claim 25 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Van Thong (U.S. Pat. No. 6,490,553) in view of Bakis (U.S. Pat. No. 6,556,972).

Claims 26 and 27 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Van Thong (U.S. Pat. No. 6,490,553) in view of Bloom et al. (U.S. Pub. No. 2005/0042591) and further in view of Sukkar (U.S. Pat. No. 6,292,778).

These rejections are respectfully traversed.

Claim 1 recites "a textual alignment module aligning a plurality of speech recordings with a plurality of textual lines of a script based on speech recognition results." Applicant submits that Van Thong fails to teach or suggest this limitation.

As acknowledged by the Examiner, Van Thong at best appears to show providing semi-automatic method for producing closed captions or more generally time-aligned transcriptions from an audio track. Van Thong, col. 3. lns. 26-28. The system (11) of Van Thong does not appear to align a recording to a script; rather, a human operator types in closed captions for a recording played by system (11). Aligning a recording with a script differs from producing a closed caption for a recording. The system (11) of Van Thong does not appear to be able to align a given recording with a given script.

Claim 1 further recites "an editing module ... accumulating line-specific portions of the plurality of speech recordings in a combination recording." The Examiner asserts that Van Thong teaches the above limitation. Applicant respectfully traverses the

Examiner's assertion. Applicant has studied Van Thong carefully, but can find no mention of a mechanism that can accumulate portions of different recordings in a combination recording. Further, as acknowledged by the Examiner, Van Thong fails to teach a plurality of speech recordings. Thus, Van Thong cannot teach accumulating portions of a plurality of speech recordings in a combination recording.

Claim 1 further recites "each of the plurality of speech recordings is aligned with the script such that line-specific portions of each of the plurality of speech recordings are aligned with one of the plurality of textual lines of the script."

The Examiner has acknowledged that Van Thong fails to teach the above limitations, but asserts that one of ordinary skill in the art would be motivated to modify Van Thong based on the teaching of Bloom to arrive at claim 1 including the above limitations. Applicant respectfully traverses the Examiner's assertion.

Bloom at best appears to show a system for replacing original actors' or singers' voices in digitized film or video with a replacement version. The Examiner asserts that the motivation for modifying Van Thong based on Bloom is to "eliminate complexity associated with user manipulation of synchronized media, wherein various recordings and sentences can be edited and synchronized with the aid of partially automated time alignment modules." Applicant is unclear what the various recordings and sentences would be. Does the Examiner mean that one of ordinary skill in the art would be motivated to provide a replacement version of original audio track to be transcribed and then replace a line-specific portion of the original audio track with a corresponding portion of the replacement version during the process of transcribing? This appears illogical. Applicant further submits that such a modification would increase the

complexity of the system of Van Thong rather than eliminate the complexity as asserted by the Examiner, because Van Tong appears to show only one audio track is to be transcribed at a time and no synchronization of various recordings is required. Therefore, Applicant respectfully requests the Examiner to clarify the basis for the rejection, especially how one of ordinary skill in the art would be motivated to modify Van Tong based on the teaching of Bloom.

In view of the foregoing, Applicant submits that claim 1 and its dependent claims 2-27 define over the art cited by the Examiner.

In addition, claim 2 recites "a ranking module adapted to tag at least one of the plurality of speech recordings and line-specific portions thereof with ranking data."

The Examiner acknowledges that Van Thong and Bloom do not teach the above limitations, but asserts that one of ordinary skill in the art would be motivated to modify Van Thong and Bloom based on the teaching of Perez-Mendez to arrive at claim 2. Applicant respectfully traverses the Examiner's assertion.

Perez-Mendez at best appears to show a system using a plurality of speech recognition engines to analyze a single speech input signal. Each of the speech recognition engines may output a different recognized text for that same speech input signal. The system may accept or reject the recognized texts from different speech recognition engines. The system may also rank top choices for the recognized texts. Perez-Mendez, col. 10, ln. 61 to col. 11 ln. 11. In Perez-Mendez, however, only one speech input is provided to all the speech recognition engines. It is the recognized texts, rather than the speech inputs, that are being ranked. Thus, Perez-Mendez cannot teach ranking a plurality of speech recordings.

In view of the foregoing, Applicant submits that claim 2 define over the art cited by the Examiner additionally for the above reasons.

CONCLUSION

It is believed that all of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicant therefore respectfully requests that the Examiner reconsider and withdraw all presently outstanding rejections. It is believed that a full and complete response has been made to the outstanding Office Action and the present application is in condition for allowance. Thus, prompt and favorable consideration of this amendment is respectfully requested. If the Examiner believes that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at (248) 641-1600.

Respectfully submitted,

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